

EXHIBIT C

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TICKETMASTER L.L.C.

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12

13 TICKETMASTER L.L.C., a Virginia
14 limited liability company,

15 Plaintiff,

16 vs.

17 RMG TECHNOLOGIES, INC., a
18 Delaware corporation, and DOES 1
19 through 10, inclusive,

Defendants.

No. CV 07-2534 ABC (JWJx)

**PLAINTIFF TICKETMASTER
L.L.C.'S SUPPLEMENTAL
RESPONSES TO RMG
TECHNOLOGIES, INC.'S
REQUESTS FOR PRODUCTION
OF DOCUMENTS (SET ONE)**

20 PROPOUNDING PARTY: RMG TECHNOLOGIES, INC., a Delaware
21 corporation

22 RESPONDING PARTY: TICKETMASTER L.L.C., a Virginia limited
23 liability company

24 SET NO.: ONE (1)
25
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1 **GENERAL OBJECTIONS AND STATEMENT**

2 Ticketmaster L.L.C. ("Plaintiff" or "Ticketmaster") makes the
3 following objections to the entire First Set of Requests For Production of
4 Documents propounded by Defendant RMG Technologies, Inc.'s ("Defendant"):

5 1. This Response is subject to all objections ordinarily available if
6 such statements or documents were offered in court. All such objections are hereby
7 expressly reserved and may be interposed at the time of trial or at any other time.
8 By providing this Response, Ticketmaster is not making any incidental or implied
9 admissions regarding the content of any document requested. No response or
10 objection to any Request herein should be taken as an admission that Ticketmaster
11 admits the existence of any fact set forth in or assumed by the Request, or that such
12 response or objection constitutes admissible evidence. No response to any Request
13 is intended to be, nor shall any response be construed as, a waiver by Ticketmaster
14 of all or any part of any objection to any request.

15 2. Ticketmaster's research, discovery, and preparation for trial in
16 this matter is ongoing and is not yet complete. This Response is based upon the
17 current state of Ticketmaster's pre-trial preparation and the investigation that it has
18 conducted to date. Ticketmaster anticipates that its continuing discovery and
19 investigation may reveal information and documents not presently known to it,
20 upon which Ticketmaster may rely during trial. Accordingly, this Response is
21 made without prejudice to Ticketmaster's rights to produce documents at a later
22 date and to introduce them at the time of trial.

23 3. Ticketmaster objects to the "Definitions" and "Instructions" in
24 the Requests to the extent that they are inconsistent with and/or seek to impose
25 obligations beyond those imposed by the Federal Rules of Civil Procedure.

26 4. Ticketmaster objects to the "Definitions" and "Instructions" in
27 the Requests to the extent that they are vague, ambiguous, and unintelligible.
28

1 5. Ticketmaster objects to each Request to the extent it seeks
2 documents or information protected from discovery by the attorney-client privilege
3 or the attorney work product doctrine.

4 6. Ticketmaster objects to each Request to the extent it seeks to
5 discover trade secrets and/or any other private, sensitive, confidential, proprietary,
6 and/or commercial information, the disclosure of which could be damaging to the
7 business or property of Ticketmaster, Ticketmaster' customers or contractors, or
8 other related business entities.

9 7. Ticketmaster objects to each Request to the extent that it
10 violates the right of privacy of Plaintiff or any third party under the United States
11 Constitution, the California Constitution, and applicable statutes.

12 8. Ticketmaster objects to each Request to the extent it seeks the
13 disclosure or production of personal records regarding consumers without proper
14 notification to the consumer.

15 9. Ticketmaster objects to all the Requests to the extent that they
16 are vague, ambiguous, and unintelligible in that the manner in which specific
17 requests are phrased creates confusion given the issues involved in the litigation.

18 10. Ticketmaster objects to all the Requests to the extent they are
19 unduly burdensome and/or oppressive.

20 11. Ticketmaster objects to all the Requests to the extent they are
21 overbroad as to time or scope.

22 Each of the general responses and objections asserted above (the
23 "General Responses and Objections") applies to each Request where appropriate
24 and are incorporated into each of Ticketmaster's responses below as though set
25 forth in full.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

Any and all DOCUMENTS which refer, reflect or relate to YOUR method of determining convenience charges for tickets sold on ticketmaster.com.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is vague and ambiguous, including but not limited to the term "method". Plaintiff further objects to this request to the extent it lacks foundation. Plaintiff further objects to this request on the ground that it is compound, overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

REQUEST FOR PRODUCTION NO. 2:

Any and all DOCUMENTS which refer, reflect or relate to all factors considered by YOU in determining convenience charges for tickets purchased on ticketmaster.com.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible

1 evidence. Plaintiff further objects to this request on the ground that it is vague and
 2 ambiguous, including but not limited to the term "considered". Plaintiff further
 3 objects to this request to the extent it lacks foundation. Plaintiff further objects to
 4 this request on the ground that it is compound, overbroad, unduly burdensome and
 5 oppressive. Plaintiff further objects to this request on the ground that it seeks the
 6 production of documents containing confidential, sensitive, proprietary,
 7 commercial, business and financial information. Plaintiff further objects to this
 8 request to the extent that it seeks documents protected by attorney-client privilege
 9 or the work-product doctrine.

10
 11 **REQUEST FOR PRODUCTION NO. 3:**

12 Any and all DOCUMENTS which refer, reflect or relate to the identity of all
 13 PERSONS involved in the decision making process of determining convenience
 14 charges for tickets purchased on ticketmaster.com.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

16 Plaintiff incorporates by reference each and every one of the General
 17 Responses and Objections as though fully set forth herein. Plaintiff further objects
 18 to this request because it seeks information neither relevant to the subject matter of
 19 this litigation nor reasonably calculated to lead to the discovery of admissible
 20 evidence. Plaintiff further objects to this request on the ground that it is vague and
 21 ambiguous, including but not limited to the phrase "decision making process".
 22 Plaintiff further objects to this request to the extent it lacks foundation. Plaintiff
 23 further objects to this request on the ground that it is compound, overbroad, unduly
 24 burdensome and oppressive. Plaintiff further objects to this request on the ground
 25 that it seeks the production of documents containing confidential, sensitive,
 26 proprietary, commercial, business and financial information. Plaintiff further
 27 objects to this request to the extent that it seeks documents protected by attorney-
 28 client privilege or the work-product doctrine.

1
2 **REQUEST FOR PRODUCTION NO. 4:**

3 Any and all DOCUMENTS which refer, reflect or relate to whether internet
4 security costs are factored into YOUR convenience charges.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence. Plaintiff further objects to this request on the ground that it is vague and
11 ambiguous, including but not limited to the phrases "internet security costs" and
12 "factored". Plaintiff further objects to this request to the extent it lacks foundation.
13 Plaintiff further objects to this request on the ground that it is compound,
14 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
15 request on the ground that it seeks the production of documents containing
16 confidential, sensitive, proprietary, commercial, business and financial information.
17 Plaintiff further objects to this request to the extent that it seeks documents
18 protected by attorney-client privilege or the work-product doctrine.

19 Subject to and without waiving the foregoing objections, Plaintiff responds
20 as follows: Convenience charges are based, among other things, on Plaintiff's cost
21 of doing business, which is in turn affected by the cost of, among other things,
22 Plaintiff's attempt to maintain a secure website. Plaintiff has conducted a diligent
23 search and reasonable inquiry during its effort to comply with this Request and has
24 no documents currently within its possession, custody or control that identify the
25 cost of attempting to maintain a secure website as a specific factor in determining
26 convenience charges.

1 **REQUEST FOR PRODUCTION NO. 5:**

2 Any and all DOCUMENTS which refer, reflect or relate to whether the costs
3 associated with paying YOUR information technology staff are factored into
4 YOUR convenience charges.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence. Plaintiff further objects to this request on the ground that it is vague and
11 ambiguous, including but not limited to the term "factored". Plaintiff further
12 objects to this request to the extent it lacks foundation. Plaintiff further objects to
13 this request on the ground that it is compound, overbroad, unduly burdensome and
14 oppressive. Plaintiff further objects to this request on the ground that it seeks the
15 production of documents containing confidential, sensitive, proprietary,
16 commercial, business and financial information. Plaintiff further objects to this
17 request to the extent that it seeks documents protected by attorney-client privilege
18 or the work-product doctrine.

19 Subject to and without waiving the foregoing objections, Plaintiff responds
20 as follows: Convenience charges are based, among other things, on Plaintiff's cost
21 of doing business, which is in turn affected by the cost of, among other things,
22 paying Plaintiff's information technology staff. Plaintiff has conducted a diligent
23 search and reasonable inquiry during its effort to comply with this Request and has
24 no documents currently within its possession, custody or control that identify the
25 cost of paying its information technology staff as a specific factor in determining
26 convenience charges.

27

28

1 **REQUEST FOR PRODUCTION NO. 6:**

2 Any and all DOCUMENTS which refer, reflect or relate to any research
3 which YOU conducted in determining convenience charges for tickets sold on
4 ticketmaster.com.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence. Plaintiff further objects to this request on the ground that it is vague and
11 ambiguous, including but not limited to the term "research". Plaintiff further
12 objects to this request to the extent it lacks foundation. Plaintiff further objects to
13 this request on the ground that it is compound, overbroad, unduly burdensome and
14 oppressive. Plaintiff further objects to this request on the ground that it seeks the
15 production of documents containing confidential, sensitive, proprietary,
16 commercial, business and financial information. Plaintiff further objects to this
17 request to the extent that it seeks documents protected by attorney-client privilege
18 or the work-product doctrine.

19
20 **REQUEST FOR PRODUCTION NO. 7:**

21 Any and all DOCUMENTS which refer, reflect or relate to any interviews
22 YOU gave to the media regarding the "Hannah Montana/Miley Cyrus Best of Both
23 Worlds" tour in the year 2007.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

25 Plaintiff incorporates by reference each and every one of the General
26 Responses and Objections as though fully set forth herein. Plaintiff further objects
27 to this request because it seeks information neither relevant to the subject matter of
28 this litigation nor reasonably calculated to lead to the discovery of admissible

1 evidence. Plaintiff further objects to this request on the ground that it is vague and
2 ambiguous, including but not limited to the term "research". Plaintiff further
3 objects to this request on the ground that it is overbroad, unduly burdensome and
4 oppressive. Plaintiff further objects to this request to the extent that it seeks
5 documents protected by attorney-client privilege or the work-product doctrine.

6 Subject to and without waiving the foregoing objections, Plaintiff responds
7 as follows: Plaintiff will make all relevant, unprivileged responsive documents
8 available for inspection.

9
10 **REQUEST FOR PRODUCTION NO. 8:**

11 Any and all DOCUMENTS which refer, reflect or relate to any
12 communications that YOU have had with the Attorney General of Arkansas, Dustin
13 McDaniel.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

15 Plaintiff incorporates by reference each and every one of the General
16 Responses and Objections as though fully set forth herein. Plaintiff further objects
17 to this request because it seeks information neither relevant to the subject matter of
18 this litigation nor reasonably calculated to lead to the discovery of admissible
19 evidence. Plaintiff further objects to this request on the ground that it is overbroad,
20 unduly burdensome and oppressive. Plaintiff further objects to this request to the
21 extent that it seeks documents protected by attorney-client privilege or the work-
22 product doctrine.

23 Subject to and without waiving the foregoing objections, Plaintiff responds
24 as follows: Plaintiff will make all relevant, unprivileged responsive documents
25 available for inspection.

1 **REQUEST FOR PRODUCTION NO. 9:**

2 Any and all DOCUMENTS which refer, reflect or relate to any
3 communications that YOU have had with the Attorney General of Missouri, Jay
4 Nixon.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence. Plaintiff further objects to this request on the ground that it is overbroad,
11 unduly burdensome and oppressive. Plaintiff further objects to this request to the
12 extent that it seeks documents protected by attorney-client privilege or the work-
13 product doctrine.

14 Subject to and without waiving the foregoing objections, Plaintiff responds
15 as follows: Plaintiff will make all relevant, unprivileged responsive documents
16 available for inspection.

17
18 **REQUEST FOR PRODUCTION NO. 10:**

19 Any and all DOCUMENTS which refer, reflect or relate to the purpose of the
20 CAPTCHA page on the ticketmaster.com website, including, but not limited to
21 emails, internal memoranda, meeting notes, manuals, handbooks and training
22 materials.

23 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

24 Plaintiff incorporates by reference each and every one of the General
25 Responses and Objections as though fully set forth herein. Plaintiff further objects
26 to this request on the ground that it is overbroad, unduly burdensome and
27 oppressive. Plaintiff further objects to this request on the ground that it seeks the
28 production of documents containing confidential, sensitive, proprietary,

1 commercial, business and financial information. Plaintiff further objects to this
2 request to the extent that it seeks documents protected by attorney-client privilege
3 or the work-product doctrine.

4 Subject to and without waiving the foregoing objections, Plaintiff responds
5 as follows: Plaintiff will make available for inspection all relevant, non-privileged
6 responsive documents. However, confidential documents responsive to this request
7 will only be made available for inspection following entry of a protective order.
8

9 **REQUEST FOR PRODUCTION NO. 11:**

10 Any and all DOCUMENTS which refer, reflect or relate to any copyrights
11 which YOU own in the ticketmaster.com website.

12 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

13 Plaintiff incorporates by reference each and every one of the General
14 Responses and Objections as though fully set forth herein. Plaintiff further objects
15 to this request to the extent it seeks information neither relevant to the subject
16 matter of this litigation nor reasonably calculated to lead to the discovery of
17 admissible evidence. Plaintiff further objects to this request on the ground that it is
18 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
19 request on the ground that it seeks the production of documents containing
20 confidential, sensitive, proprietary, commercial, business and financial information.
21 Plaintiff further objects to this request to the extent that it seeks documents
22 protected by attorney-client privilege or the work-product doctrine.

23 Subject to and without waiving the foregoing objections, Plaintiff responds
24 as follows: Plaintiff will make available for inspection all relevant, non-privileged
25 responsive documents. However, confidential documents responsive to this request
26 will only be made available for inspection following entry of a protective order.
27
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REQUEST FOR PRODUCTION NO. 12:

Any and all DOCUMENTS which refer, reflect or relate to any claim that YOU have made for loss of goodwill from January 1, 2002 to present, including, but not limited to corporate tax returns, financial statements and profit and loss statements.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it is vague, ambiguous and unintelligible, including but not limited to the phrase "any claim that YOU have made for loss of goodwill." Plaintiff further objects to this request to the extent it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

REQUEST FOR PRODUCTION NO. 13:

Any and all DOCUMENTS which refer, reflect or relate to any investigation that YOU have performed regarding the use of "spiders" on the ticketmaster.com website.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible

1 evidence. Plaintiff further objects to this request because it is vague and
2 ambiguous. Plaintiff further objects to this request on the ground that it is
3 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
4 request on the ground that it seeks the production of documents containing
5 confidential, sensitive, proprietary, commercial, business and financial information.
6 Plaintiff further objects to this request to the extent that it seeks documents
7 protected by attorney-client privilege or the work-product doctrine.

8 Subject to and without waiving the foregoing objections, Plaintiff responds
9 as follows: Plaintiff will make available for inspection all relevant, non-privileged
10 responsive documents. However, confidential documents responsive to this request
11 will only be made available for inspection following entry of a protective order.
12

13 **REQUEST FOR PRODUCTION NO. 14:**

14 Any and all DOCUMENTS which refer, reflect or relate to any investigation
15 that YOU have performed regarding the use of "robots" on the ticketmaster.com
16 website.

17 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

18 Plaintiff incorporates by reference each and every one of the General
19 Responses and Objections as though fully set forth herein. Plaintiff further objects
20 to this request because it seeks information neither relevant to the subject matter of
21 this litigation nor reasonably calculated to lead to the discovery of admissible
22 evidence. Plaintiff further objects to this request because it is vague and
23 ambiguous. Plaintiff further objects to this request on the ground that it is
24 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
25 request on the ground that it seeks the production of documents containing
26 confidential, sensitive, proprietary, commercial, business and financial information.
27 Plaintiff further objects to this request to the extent that it seeks documents
28 protected by attorney-client privilege or the work-product doctrine.

1 Subject to and without waiving the foregoing objections, Plaintiff responds
 2 as follows: Plaintiff will make available for inspection all relevant, non-privileged
 3 responsive documents. However, confidential documents responsive to this request
 4 will only be made available for inspection following entry of a protective order.

5
 6 **REQUEST FOR PRODUCTION NO. 15:**

7 Any and all DOCUMENTS which refer, reflect or relate to any investigation
 8 that YOU have performed regarding the use of "bots" on the ticketmaster.com web
 9 site.

10 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

11 Plaintiff incorporates by reference each and every one of the General
 12 Responses and Objections as though fully set forth herein. Plaintiff further objects
 13 to this request because it seeks information neither relevant to the subject matter of
 14 this litigation nor reasonably calculated to lead to the discovery of admissible
 15 evidence. Plaintiff further objects to this request because it is vague and
 16 ambiguous. Plaintiff further objects to this request on the ground that it is
 17 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
 18 request on the ground that it seeks the production of documents containing
 19 confidential, sensitive, proprietary, commercial, business and financial information.
 20 Plaintiff further objects to this request to the extent that it seeks documents
 21 protected by attorney-client privilege or the work-product doctrine.

22 Subject to and without waiving the foregoing objections, Plaintiff responds
 23 as follows: Plaintiff will make available for inspection all relevant, non-privileged
 24 responsive documents. However, confidential documents responsive to this request
 25 will only be made available for inspection following entry of a protective order.
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1 **REQUEST FOR PRODUCTION NO. 16:**

2 Any and all DOCUMENTS which refer, reflect or relate to any investigation
3 that YOU have performed regarding the use of "automatic devices" on the
4 ticketmaster.com website.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence. Plaintiff further objects to this request because it is vague and
11 ambiguous. Plaintiff further objects to this request on the ground that it is
12 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
13 request on the ground that it seeks the production of documents containing
14 confidential, sensitive, proprietary, commercial, business and financial information.
15 Plaintiff further objects to this request to the extent that it seeks documents
16 protected by attorney-client privilege or the work-product doctrine.

17 Subject to and without waiving the foregoing objections, Plaintiff responds
18 as follows: Plaintiff will make available for inspection all relevant, non-privileged
19 responsive documents. However, confidential documents responsive to this request
20 will only be made available for inspection following entry of a protective order.

21
22 **REQUEST FOR PRODUCTION NO. 17:**

23 Any and all DOCUMENTS which refer, reflect or relate to any investigation
24 that YOU have performed regarding the use of "automated processes" on the
25 ticketmaster.com website.

26 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

27 Plaintiff incorporates by reference each and every one of the General
28 Responses and Objections as though fully set forth herein. Plaintiff further objects

1 to this request because it seeks information neither relevant to the subject matter of
2 this litigation nor reasonably calculated to lead to the discovery of admissible
3 evidence. Plaintiff further objects to this request because it is vague and
4 ambiguous. Plaintiff further objects to this request on the ground that it is
5 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
6 request on the ground that it seeks the production of documents containing
7 confidential, sensitive, proprietary, commercial, business and financial information.
8 Plaintiff further objects to this request to the extent that it seeks documents
9 protected by attorney-client privilege or the work-product doctrine.

10 Subject to and without waiving the foregoing objections, Plaintiff responds
11 as follows: Plaintiff will make available for inspection all relevant, non-privileged
12 responsive documents. However, confidential documents responsive to this request
13 will only be made available for inspection following entry of a protective order.
14

15 **REQUEST FOR PRODUCTION NO. 18:**

16 Any and all DOCUMENTS which refer, reflect or relate to any investigation
17 that YOU have performed with respect to RMG Technologies, Inc., a Delaware
18 corporation.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

20 Plaintiff incorporates by reference each and every one of the General
21 Responses and Objections as though fully set forth herein. Plaintiff further objects
22 to this request to the extent it seeks information neither relevant to the subject
23 matter of this litigation nor reasonably calculated to lead to the discovery of
24 admissible evidence. Plaintiff further objects to this request on the ground that it is
25 vague and ambiguous. Plaintiff further objects to this request on the ground that it
26 is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
27 request on the ground that it seeks the production of documents containing
28 confidential, sensitive, proprietary, commercial, business and financial information.

1 Plaintiff further objects to this request to the extent that it seeks documents
2 protected by attorney-client privilege or the work-product doctrine.

3 Subject to and without waiving the foregoing objections, Plaintiff responds
4 as follows: Plaintiff will make available for inspection all relevant, non-privileged
5 responsive documents. However, confidential documents responsive to this request
6 will only be made available for inspection following entry of a protective order.

7
8 **REQUEST FOR PRODUCTION NO. 19:**

9 Any and all DOCUMENTS which refer, reflect or relate to RMG
10 Technologies, Inc., a Delaware corporation.

11 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

12 Plaintiff incorporates by reference each and every one of the General
13 Responses and Objections as though fully set forth herein. Plaintiff further objects
14 to this request to the extent that it seeks information neither relevant to the subject
15 matter of this litigation nor reasonably calculated to lead to the discovery of
16 admissible evidence. Plaintiff further objects to this request on the ground that it is
17 vague and ambiguous. Plaintiff further objects to this request on the ground that it
18 is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
19 request on the ground that it seeks the production of documents containing
20 confidential, sensitive, proprietary, commercial, business and financial information.
21 Plaintiff further objects to this request to the extent that it seeks documents
22 protected by attorney-client privilege or the work-product doctrine.

23 Subject to and without waiving the foregoing objections, Plaintiff responds
24 as follows: Plaintiff will make available for inspection all relevant, non-privileged
25 responsive documents. However, confidential documents responsive to this request
26 will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 20:

Any and all DOCUMENTS which refer, reflect or relate to any communications between YOU and Chris Kovach.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will make available for inspection all relevant, non-privileged responsive documents. However, confidential documents responsive to this request will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 21:

Any and all DOCUMENTS which refer, reflect or relate to the settlement agreement between YOU and Chris Kovach, as referenced in YOUR motion for preliminary injunction in this matter.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request to the extent it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is

1 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
2 request on the ground that it violates the right to privacy of a third party. Plaintiff
3 further objects to this request to the extent that it seeks documents protected by
4 attorney-client privilege or the work-product doctrine.

5 Subject to and without waiving the foregoing objections, Plaintiff responds
6 as follows: Plaintiff will make available for inspection all relevant, non-privileged
7 responsive documents. However, confidential documents responsive to this request
8 will only be made available for inspection following entry of a protective order.

9
10 **REQUEST FOR PRODUCTION NO. 22:**

11 Any and all DOCUMENTS which refer, reflect or relate to any purchase of
12 tickets that Chris Kovach or anyone on his behalf made on ticketmaster.com prior
13 to May of 2007.

14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

15 Plaintiff incorporates by reference each and every one of the General
16 Responses and Objections as though fully set forth herein. Plaintiff further objects
17 to this request to the extent that it seeks information neither relevant to the subject
18 matter of this litigation nor reasonably calculated to lead to the discovery of
19 admissible evidence. Plaintiff further objects to this request on the ground that it is
20 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
21 request on the ground that it seeks the production of documents containing
22 confidential, sensitive, proprietary, commercial, business and financial information.
23 Plaintiff further objects to this request on the ground that it violates the right to
24 privacy of a third party. Plaintiff further objects to this request to the extent that it
25 seeks documents protected by attorney-client privilege or the work-product
26 doctrine.

27 Subject to and without waiving the foregoing objections, Plaintiff responds
28 as follows: Plaintiff will make available for inspection all relevant, non-privileged

1 responsive documents. However, confidential documents responsive to this request
2 will only be made available for inspection following entry of a protective order.
3

4 **REQUEST FOR PRODUCTION NO. 23:**

5 Any and all DOCUMENTS which refer, reflect or relate to any purchase of
6 tickets that Chris Kovach or anyone on his behalf made on ticketmaster.com
7 subsequent to May of 2007.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

9 Plaintiff incorporates by reference each and every one of the General
10 Responses and Objections as though fully set forth herein. Plaintiff further objects
11 to this request because it seeks information neither relevant to the subject matter of
12 this litigation nor reasonably calculated to lead to the discovery of admissible
13 evidence. Plaintiff further objects to this request on the ground that it seeks the
14 production of documents containing confidential, sensitive, proprietary,
15 commercial, business and financial information. Plaintiff further objects to this
16 request on the ground that it violates the right to privacy of a third party. Plaintiff
17 further objects to this request to the extent that it seeks documents protected by
18 attorney-client privilege or the work-product doctrine.
19

20 **REQUEST FOR PRODUCTION NO. 24:**

21 Any and all DOCUMENTS which refer, reflect or relate to the first time
22 YOU learned that RMG's devices were allegedly being used on ticketmaster.com.

23 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

24 Plaintiff incorporates by reference each and every one of the General
25 Responses and Objections as though fully set forth herein. Plaintiff further objects
26 to this request to the extent that it seeks information neither relevant to the subject
27 matter of this litigation nor reasonably calculated to lead to the discovery of
28 admissible evidence. Plaintiff further objects to this request on the ground that it is

1 vague and ambiguous, including but not limited to the phrase "RMG's devices."
2 Plaintiff further objects to this request on the ground that it seeks the production of
3 documents containing confidential, sensitive, proprietary, commercial, business and
4 financial information. Plaintiff further objects to this request to the extent that it
5 seeks documents protected by attorney-client privilege or the work-product
6 doctrine.

7 Subject to and without waiving the foregoing objections, Plaintiff responds
8 as follows: Plaintiff will make available for inspection all relevant, non-privileged
9 responsive documents. However, confidential documents responsive to this request
10 will only be made available for inspection following entry of a protective order.

11
12 **REQUEST FOR PRODUCTION NO. 25:**

13 Any and all DOCUMENTS which refer, reflect or relate to any technological
14 measure that YOU have taken to stop the use of "spiders" on the ticketmaster.com
15 website.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

17 Plaintiff incorporates by reference each and every one of the General
18 Responses and Objections as though fully set forth herein. Plaintiff further objects
19 to this request because it seeks information neither relevant to the subject matter of
20 this litigation nor reasonably calculated to lead to the discovery of admissible
21 evidence. Plaintiff further objects to this request on the ground that it is overbroad,
22 unduly burdensome and oppressive. Plaintiff further objects to this request on the
23 ground that it seeks the production of documents containing confidential, sensitive,
24 proprietary, commercial, business and financial information. Plaintiff further
25 objects to this request to the extent that it seeks documents protected by attorney-
26 client privilege or the work-product doctrine.

27 Subject to and without waiving the foregoing objections, Plaintiff responds
28 as follows: Plaintiff will make available for inspection all relevant, non-privileged

1 responsive documents. However, confidential documents responsive to this request
2 will only be made available for inspection following entry of a protective order.
3

4 **REQUEST FOR PRODUCTION NO. 26:**

5 Any and all DOCUMENTS which refer, reflect or relate to any technological
6 measure that YOU have taken to stop the use of "robots" on the ticketmaster.com
7 website.

8 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

9 Plaintiff incorporates by reference each and every one of the General
10 Responses and Objections as though fully set forth herein. Plaintiff further objects
11 to this request because it seeks information neither relevant to the subject matter of
12 this litigation nor reasonably calculated to lead to the discovery of admissible
13 evidence. Plaintiff further objects to this request on the ground that it is overbroad,
14 unduly burdensome and oppressive. Plaintiff further objects to this request on the
15 ground that it seeks the production of documents containing confidential, sensitive,
16 proprietary, commercial, business and financial information. Plaintiff further
17 objects to this request to the extent that it seeks documents protected by attorney-
18 client privilege or the work-product doctrine.

19 Subject to and without waiving the foregoing objections, Plaintiff responds
20 as follows: Plaintiff will make available for inspection all relevant, non-privileged
21 responsive documents. However, confidential documents responsive to this request
22 will only be made available for inspection following entry of a protective order.
23

24 **REQUEST FOR PRODUCTION NO. 27:**

25 Any and all DOCUMENTS which refer, reflect or relate to any technological
26 measure that YOU have taken to stop the use of "bots" on the ticketmaster.com
27 website.
28

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will make available for inspection all relevant, non-privileged responsive documents. However, confidential documents responsive to this request will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 28:

Any and all DOCUMENTS which refer, reflect or relate to any technological measure that YOU have taken to stop the use of "automatic devices" on the ticketmaster.com website.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive,

1 proprietary, commercial, business and financial information. Plaintiff further
2 objects to this request to the extent that it seeks documents protected by attorney-
3 client privilege or the work-product doctrine.

4 Subject to and without waiving the foregoing objections, Plaintiff responds
5 as follows: Plaintiff will make available for inspection all relevant, non-privileged
6 responsive documents. However, confidential documents responsive to this request
7 will only be made available for inspection following entry of a protective order.

8
9 **REQUEST FOR PRODUCTION NO. 29:**

10 Any and all DOCUMENTS which refer, reflect or relate to any technological
11 measure that YOU have taken to stop the use of "automated processes" on the
12 ticketmaster.com website.

13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

14 Plaintiff incorporates by reference each and every one of the General
15 Responses and Objections as though fully set forth herein. Plaintiff further objects
16 to this request because it seeks information neither relevant to the subject matter of
17 this litigation nor reasonably calculated to lead to the discovery of admissible
18 evidence. Plaintiff further objects to this request on the ground that it is overbroad,
19 unduly burdensome and oppressive. Plaintiff further objects to this request on the
20 ground that it seeks the production of documents containing confidential, sensitive,
21 proprietary, commercial, business and financial information. Plaintiff further
22 objects to this request to the extent that it seeks documents protected by attorney-
23 client privilege or the work-product doctrine.

24 Subject to and without waiving the foregoing objections, Plaintiff responds
25 as follows: Plaintiff will make available for inspection all relevant, non-privileged
26 responsive documents. However, confidential documents responsive to this request
27 will only be made available for inspection following entry of a protective order.

1 **REQUEST FOR PRODUCTION NO. 30:**

2 Any and all DOCUMENTS which refer, reflect or relate to any measures
3 YOU took to calculate the actual damages that YOU would incur in the event that a
4 user of ticketmaster.com accessed more than 1,000 pages of the ticketmaster.com
5 website in any twenty four (24) hour period.

6 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

7 Plaintiff incorporates by reference each and every one of the General
8 Responses and Objections as though fully set forth herein. Plaintiff further objects
9 to this request on the ground that it is compound, overbroad, unduly burdensome
10 and oppressive. Plaintiff further objects to this request on the ground that it is
11 vague and ambiguous, including but not limited to the phrase "any measures YOU
12 took". Plaintiff further objects to this request on the ground that it seeks the
13 production of documents containing confidential, sensitive, proprietary,
14 commercial, business and financial information. Plaintiff further objects to this
15 request to the extent that it seeks documents protected by attorney-client privilege
16 or the work-product doctrine.

17 Subject to and without waiving the foregoing objections, Plaintiff responds
18 as follows: Plaintiff will make available for inspection all relevant, non-privileged
19 responsive documents, if any exist. However, confidential documents responsive to
20 this request will only be made available for inspection following entry of a
21 protective order.

22
23 **REQUEST FOR PRODUCTION NO. 31:**

24 Any and all DOCUMENTS which refer, reflect or relate to the identity of
25 any PERSON who performed any calculation on YOUR behalf as to the actual
26 damages that YOU would incur in the event that a user of ticketmaster.com
27 accessed more than 1,000 pages of the ticketmaster.com website in any twenty four
28 (24) hour period.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request on the ground that it is compound, overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it is vague and ambiguous, including but not limited to the phrase "reflect or relate to the identity of". Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will make available for inspection all relevant, non-privileged responsive documents, if any exist. However, confidential documents responsive to this request will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 32:

Any and all DOCUMENTS which refer, reflect or relate to any monies that YOU have spent on technological measures that YOU have taken to stop the use of spiders, robots, bots, automatic devices or automated processes on the ticketmaster.com website.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is

1 vague and ambiguous, including but not limited to the phrase “refer, reflect or relate
2 to any monies”. Plaintiff further objects to this request on the ground that it is
3 compound, overbroad, unduly burdensome and oppressive. Plaintiff further objects
4 to this request on the ground that it seeks the production of documents containing
5 confidential, sensitive, proprietary, commercial, business and financial information.
6 Plaintiff further objects to this request to the extent that it seeks documents
7 protected by attorney-client privilege or the work-product doctrine.

8 Subject to and without waiving the foregoing objections, Plaintiff responds
9 as follows: Plaintiff will make available for inspection all relevant, non-privileged
10 responsive documents. However, confidential documents responsive to this request
11 will only be made available for inspection following entry of a protective order.
12

13 **REQUEST FOR PRODUCTION NO. 33:**

14 Any and all DOCUMENTS which refer, reflect or relate to any PERSON
15 who YOU have employed, either as an employee or an independent contractor, in
16 an attempt to stop the use of spiders, robots, bots, automated devices or automated
17 processes on the ticketmaster.com website.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

19 Plaintiff incorporates by reference each and every one of the General
20 Responses and Objections as though fully set forth herein. Plaintiff further objects
21 to this request on the ground that it is vague and ambiguous, including but not
22 limited to the phrase “employed . . . in an attempt”. Plaintiff further objects to
23 this request to the extent that it lacks foundation. Plaintiff further objects to this
24 request on the ground that it is overbroad, unduly burdensome and oppressive.
25 Plaintiff further objects to this request on the ground that it seeks the production of
26 documents containing confidential, sensitive, proprietary, commercial, business and
27 financial information. Plaintiff further objects to this request on the ground that it
28 violates the right to privacy of a third party. Plaintiff further objects to this request

1 to the extent that it seeks documents protected by attorney-client privilege or the
2 work-product doctrine.

3 Subject to and without waiving the foregoing objections, Plaintiff responds
4 as follows: Following entry of a protective order, Plaintiff will make available for
5 inspection all relevant, non-privileged documents relating to attempts by
6 Ticketmaster's employees or independent contractors working on its behalf to stop
7 the use of spiders, robots, bots, automated devices or automated processes on the
8 ticketmaster.com website.

9
10 **REQUEST FOR PRODUCTION NO. 34:**

11 Any and all DOCUMENTS which refer, reflect or relate to any money that
12 you have paid to any PERSON who YOU have employed, either as an employee or
13 an independent contractor, in an attempt to stop the use of spiders, robots, bots,
14 automated devices or automated processes on the ticketmaster.com website.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

16 Plaintiff incorporates by reference each and every one of the General
17 Responses and Objections as though fully set forth herein. Plaintiff further objects
18 to this request on the ground that it is vague and ambiguous, including but not
19 limited to the phrases "refer, reflect or relate to any money" and "employed . . . in
20 an attempt". Plaintiff further objects to this request to the extent that it lacks
21 foundation. Plaintiff further objects to this request on the ground that it is
22 compound, overbroad, unduly burdensome and oppressive. Plaintiff further objects
23 to this request on the ground that it seeks the production of documents containing
24 confidential, sensitive, proprietary, commercial, business and financial information.
25 Plaintiff further objects to this request on the ground that it violates the right to
26 privacy of a third party. Plaintiff further objects to this request to the extent that it
27 seeks documents protected by attorney-client privilege or the work-product
28 doctrine.

1 Subject to and without waiving the foregoing objections, Plaintiff responds
 2 as follows: Plaintiff will make available for inspection all relevant, non-privileged
 3 responsive documents. However, confidential documents responsive to this request
 4 will only be made available for inspection following entry of a protective order.

5
 6 **REQUEST FOR PRODUCTION NO. 35:**

7 Any and all DOCUMENTS which refer, reflect or relate to any complaints
 8 that any of YOUR CLIENTS have made to YOU regarding the use of spiders,
 9 robots, bots, automated devices or automated processes on the ticketmaster.com
 10 website.

11 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

12 Plaintiff incorporates by reference each and every one of the General
 13 Responses and Objections as though fully set forth herein. Plaintiff further objects
 14 to this request on the ground that it is vague and ambiguous, including but not
 15 limited to the term "complaints". Plaintiff further objects to this request on the
 16 ground that it is compound, overbroad, unduly burdensome and oppressive.
 17 Plaintiff further objects to this request on the ground that it seeks the production of
 18 documents containing confidential, sensitive, proprietary, commercial, business and
 19 financial information. Plaintiff further objects to this request on the ground that it
 20 violates the right to privacy of a third party. Plaintiff further objects to this request
 21 to the extent that it seeks documents protected by attorney-client privilege or the
 22 work-product doctrine.

23 Subject to and without waiving the foregoing objections, Plaintiff responds
 24 as follows: Plaintiff will make available for inspection all relevant, non-privileged
 25 responsive documents. However, confidential documents responsive to this request
 26 will only be made available for inspection following entry of a protective order.

1 **REQUEST FOR PRODUCTION NO. 36:**

2 Any and all DOCUMENTS which refer, reflect or relate to any complaints
3 that any of YOUR CLIENTS have made to YOU regarding YOUR inability to
4 distribute tickets in a fair and equitable manner.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request on the ground that it is vague and ambiguous, including but not
9 limited to the term "complaints". Plaintiff further objects to this request on the
10 ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further
11 objects to this request to the extent that it lacks foundation. Plaintiff further objects
12 to this request to the extent that it seeks information neither relevant to the subject
13 matter of this litigation nor reasonably calculated to lead to the discovery of
14 admissible evidence. Plaintiff further objects to this request on the ground that it
15 seeks the production of documents containing confidential, sensitive, proprietary,
16 commercial, business and financial information. Plaintiff further objects to this
17 request on the ground that it violates the right to privacy of a third party. Plaintiff
18 further objects to this request to the extent that it seeks documents protected by
19 attorney-client privilege or the work-product doctrine.

20 Subject to and without waiving the foregoing objections, Plaintiff responds
21 as follows: Plaintiff will make available for inspection all relevant, non-privileged
22 responsive documents. However, confidential documents responsive to this request
23 will only be made available for inspection following entry of a protective order.

24
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28

REQUEST FOR PRODUCTION NO. 37:

Any and all DOCUMENTS which refer, reflect or relate to any complaints that any of YOUR CUSTOMERS have made to YOU regarding YOUR inability to distribute tickets in a fair and equitable manner.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request on the ground that it is vague and ambiguous, including but not limited to the term "complaints". Plaintiff further objects to this request to the extent that it lacks foundation. Plaintiff further objects to this request to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will make available for inspection all relevant, non-privileged responsive documents. However, confidential documents responsive to this request will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 38:

Any and all DOCUMENTS which refer, reflect or relate to the number of tickets available for retail sale for each concert on the "Hannah Montana & Miley Cyrus: Best of Both Worlds Tour" from January 1, 2007 through February 2008.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is vague and ambiguous, including but not limited to the phrase "number of tickets available for retail sale". Plaintiff further objects to this request on the ground that it is compound, overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will make available for inspection all relevant, non-privileged responsive documents. However, confidential documents responsive to this request will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 39:

Any and all DOCUMENTS which refer, reflect or relate to the number of tickets available for retail sale to fan club members for each concert on the "Hannah Montana & Miley Cyrus: Best of Both Worlds Tour" from January 1, 2007 through February 2008.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible

1 evidence. Plaintiff further objects to this request on the ground that it is vague and
2 ambiguous, including but not limited to the phrase "number of tickets available for
3 retail sale". Plaintiff further objects to this request on the ground that it is
4 compound, overbroad, unduly burdensome and oppressive. Plaintiff further objects
5 to this request on the ground that it seeks the production of documents containing
6 confidential, sensitive, proprietary, commercial, business and financial information.
7 Plaintiff further objects to this request to the extent that it seeks documents
8 protected by attorney-client privilege or the work-product doctrine.

9 Subject to and without waiving the foregoing objections, Plaintiff responds
10 as follows: Plaintiff will make available for inspection all relevant, non-privileged
11 responsive documents, if any exist. However, confidential documents responsive to
12 this request will only be made available for inspection following entry of a
13 protective order.

14
15 **REQUEST FOR PRODUCTION NO. 40:**

16 Any and all DOCUMENTS which refer, reflect or relate to the number of
17 tickets available for retail sale to the general public for each concert on the "Hannah
18 Montana & Miley Cyrus: Best of Both Worlds Tour" from January 1, 2007 through
19 February 2008.

20 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

21 Plaintiff incorporates by reference each and every one of the General
22 Responses and Objections as though fully set forth herein. Plaintiff further objects
23 to this request because it seeks information neither relevant to the subject matter of
24 this litigation nor reasonably calculated to lead to the discovery of admissible
25 evidence. Plaintiff further objects to this request on the ground that it is vague and
26 ambiguous, including but not limited to the phrases "number of tickets available for
27 retail sale" and "general public". Plaintiff further objects to this request on the
28 ground that it is compound, overbroad, unduly burdensome and oppressive.

1 Plaintiff further objects to this request on the ground that it seeks the production of
 2 documents containing confidential, sensitive, proprietary, commercial, business and
 3 financial information. Plaintiff further objects to this request to the extent that it
 4 seeks documents protected by attorney-client privilege or the work-product
 5 doctrine.

6 Subject to and without waiving the foregoing objections, Plaintiff responds
 7 as follows: Plaintiff will make available for inspection all relevant, non-privileged
 8 responsive documents. However, confidential documents responsive to this request
 9 will only be made available for inspection following entry of a protective order.

10
 11 **REQUEST FOR PRODUCTION NO. 41:**

12 Any and all DOCUMENTS which refer, reflect or relate to the number of
 13 tickets retained by Miley Cyrus for each concert on the "Hannah Montana & Miley
 14 Cyrus: Best of Both Worlds Tour" from January 1, 2007 through February 2008.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

16 Plaintiff incorporates by reference each and every one of the General
 17 Responses and Objections as though fully set forth herein. Plaintiff further objects
 18 to this request because it seeks information neither relevant to the subject matter of
 19 this litigation nor reasonably calculated to lead to the discovery of admissible
 20 evidence. Plaintiff further objects to this request on the ground that it is vague and
 21 ambiguous, including but not limited to the term "retained". Plaintiff further
 22 objects to this request on the ground that it is compound, overbroad, unduly
 23 burdensome and oppressive. Plaintiff further objects to this request on the ground
 24 that it seeks the production of documents containing confidential, sensitive,
 25 proprietary, commercial, business and financial information. Plaintiff further
 26 objects to this request to the extent that it seeks documents protected by attorney-
 27 client privilege or the work-product doctrine.

1 Subject to and without waiving the foregoing objections, Plaintiff responds
2 as follows: Plaintiff will make available for inspection all relevant, non-privileged
3 responsive documents, if any exist. However, confidential documents responsive to
4 this request will only be made available for inspection following entry of a
5 protective order.

6
7 **REQUEST FOR PRODUCTION NO. 42:**

8 Any and all DOCUMENTS which refer, reflect or relate to the number of
9 tickets retained by the promoters of the "Hannah Montana & Miley Cyrus: Best of
10 Both Worlds Tour" for all concerts of the tour from January 1, 2007 through
11 February 2008.

12 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

13 Plaintiff incorporates by reference each and every one of the General
14 Responses and Objections as though fully set forth herein. Plaintiff further objects
15 to this request because it seeks information neither relevant to the subject matter of
16 this litigation nor reasonably calculated to lead to the discovery of admissible
17 evidence. Plaintiff further objects to this request on the ground that it is vague and
18 ambiguous, including but not limited to the term "retained". Plaintiff further
19 objects to this request on the ground that it is compound, overbroad, unduly
20 burdensome and oppressive. Plaintiff further objects to this request on the ground
21 that it seeks the production of documents containing confidential, sensitive,
22 proprietary, commercial, business and financial information. Plaintiff further
23 objects to this request to the extent that it seeks documents protected by attorney-
24 client privilege or the work-product doctrine.

25 Subject to and without waiving the foregoing objections, Plaintiff responds
26 as follows: Plaintiff will make available for inspection all relevant, non-privileged
27 responsive documents, if any exist. However, confidential documents responsive to
28

1 this request will only be made available for inspection following entry of a
2 protective order.

3
4 **REQUEST FOR PRODUCTION NO. 43:**

5 Any and all DOCUMENTS which refer, reflect or relate to the number of
6 tickets retained by the venues where the "Hannah Montana & Miley Cyrus: Best of
7 Both Worlds Tour" occurred for all concerts of the tour from January 1, 2007
8 through February 2008.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

10 Plaintiff incorporates by reference each and every one of the General
11 Responses and Objections as though fully set forth herein. Plaintiff further objects
12 to this request because it seeks information neither relevant to the subject matter of
13 this litigation nor reasonably calculated to lead to the discovery of admissible
14 evidence. Plaintiff further objects to this request on the ground that it is vague and
15 ambiguous, including but not limited to the term "retained". Plaintiff further
16 objects to this request on the ground that it is compound, overbroad, unduly
17 burdensome and oppressive. Plaintiff further objects to this request on the ground
18 that it seeks the production of documents containing confidential, sensitive,
19 proprietary, commercial, business and financial information. Plaintiff further
20 objects to this request to the extent that it seeks documents protected by attorney-
21 client privilege or the work-product doctrine.

22 Subject to and without waiving the foregoing objections, Plaintiff responds
23 as follows: Plaintiff has conducted a diligent search and reasonable inquiry during
24 its effort to comply with this Request and has no documents currently within its
25 possession, custody or control that are responsive to this Request.

REQUEST FOR PRODUCTION NO. 44:

Any and all DOCUMENTS which refer, reflect or relate to all tickets to the “Hannah Montana & Miley Cyrus: Best of Both Worlds Tour” which YOU sold on the auction portion of the ticketmaster.com website from January 1, 2007 to present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine. Plaintiff further objects to this request on the grounds that it is premature at this time, given Plaintiff’s pending motion to dismiss Defendant’s counter-claim.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will make available for inspection all relevant, non-privileged responsive documents. However, confidential documents responsive to this request will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 45:

Any and all DOCUMENTS which refer, reflect or relate to the price of each ticket to the “Hannah Montana & Miley Cyrus: Best of Both Worlds Tour” which YOU sold on the auction portion of the ticketmaster.com website from January 1, 2007 to present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

Subject to and without waiving the foregoing objections, Plaintiff responds as follows: Plaintiff will make available for inspection all relevant, non-privileged responsive documents. However, confidential documents responsive to this request will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 46:

Any and all DOCUMENTS which refer, reflect or relate to all tickets to the "Hannah Montana & Miley Cyrus: Best of Both Worlds Tour" which were sold on TicketExchange portion of the ticketmaster.com website from January 1, 2007 to present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and

1 oppressive. Plaintiff further objects to this request on the ground that it seeks the
2 production of documents containing confidential, sensitive, proprietary,
3 commercial, business and financial information. Plaintiff further objects to this
4 request to the extent that it seeks documents protected by attorney-client privilege
5 or the work-product doctrine.
6

7 **REQUEST FOR PRODUCTION NO. 47:**

8 Any and all DOCUMENTS which refer, reflect or relate to all convenience
9 charges YOU were paid as a result of sales on the TicketExchange portion of the
10 ticketmaster.com website for the "Hannah Montana & Miley Cyrus: Best of Both
11 Worlds Tour" from January 1, 2007 to present.

12 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

13 Plaintiff incorporates by reference each and every one of the General
14 Responses and Objections as though fully set forth herein. Plaintiff further objects
15 to this request because it seeks information neither relevant to the subject matter of
16 this litigation nor reasonably calculated to lead to the discovery of admissible
17 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
18 to this request on the ground that it is overbroad, unduly burdensome and
19 oppressive. Plaintiff further objects to this request on the ground that it seeks the
20 production of documents containing confidential, sensitive, proprietary,
21 commercial, business and financial information. Plaintiff further objects to this
22 request to the extent that it seeks documents protected by attorney-client privilege
23 or the work-product doctrine.
24

25 **REQUEST FOR PRODUCTION NO. 48:**

26 Any and all DOCUMENTS which refer, reflect or relate to any agreements
27 you had with any PERSON to sell tickets to the "Hannah Montana & Miley Cyrus:
28 Best of Both Worlds Tour."

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

REQUEST FOR PRODUCTION NO. 49:

Any and all DOCUMENTS which refer, reflect or relate to any tickets purchased by or on behalf of Thomas J. Prior on the ticketmaster.com website from February 1, 2007 to present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party. Plaintiff further objects to this request to the extent that it

1 seeks documents protected by attorney-client privilege or the work-product
2 doctrine.

3 Subject to and without waiving the foregoing objections, Plaintiff responds
4 as follows: Plaintiff will make available for inspection all relevant, non-privileged
5 responsive documents. However, confidential documents responsive to this request
6 will only be made available for inspection following entry of a protective order.

7
8 **REQUEST FOR PRODUCTION NO. 50:**

9 Any and all DOCUMENTS which refer, reflect or relate to any tickets
10 purchased by or on behalf of Gary Charles Bonner on the ticketmaster.com website
11 from February 1, 2007 to present.

12 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

13 Plaintiff incorporates by reference each and every one of the General
14 Responses and Objections as though fully set forth herein. Plaintiff further objects
15 to this request to the extent that it seeks information neither relevant to the subject
16 matter of this litigation nor reasonably calculated to lead to the discovery of
17 admissible evidence. Plaintiff further objects to this request on the ground that it is
18 overbroad, unduly burdensome and oppressive. Plaintiff further objects to this
19 request on the ground that it seeks the production of documents containing
20 confidential, sensitive, proprietary, commercial, business and financial information.
21 Plaintiff further objects to this request on the ground that it violates the right to
22 privacy of a third party. Plaintiff further objects to this request to the extent that it
23 seeks documents protected by attorney-client privilege or the work-product
24 doctrine.

25 Subject to and without waiving the foregoing objections, Plaintiff responds
26 as follows: Plaintiff will make available for inspection all relevant, non-privileged
27 responsive documents. However, confidential documents responsive to this request
28 will only be made available for inspection following entry of a protective order.

REQUEST FOR PRODUCTION NO. 51:

Any and all DOCUMENTS which refer, reflect or relate to any tickets purchased by or on behalf of Designer Tickets on the ticketmaster.com website from February 1, 2007 to present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request to the extent that it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the ground that it is overbroad, unduly burdensome and oppressive. Plaintiff further objects to this request on the ground that it seeks the production of documents containing confidential, sensitive, proprietary, commercial, business and financial information. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party. Plaintiff further objects to this request to the extent that it seeks documents protected by attorney-client privilege or the work-product doctrine.

REQUEST FOR PRODUCTION NO. 52:

Any and all DOCUMENTS which refer, reflect or relate to any communications that YOU have had with Barry's Tickets, located in Los Angeles, California, regarding the possible sale of the Barry's Tickets business to YOU.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible

1 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
2 to this request on the ground that it lacks foundation. Plaintiff further objects to this
3 request on the ground that it violates the right to privacy of a third party.
4

5 **REQUEST FOR PRODUCTION NO. 53:**

6 Any and all DOCUMENTS which refer, reflect or relate to any
7 communications that YOU have had with Sea Coast Ticket Agency, Inc. located in
8 Portsmouth, New Hampshire, regarding the possible sale of the Sea Coast Ticket
9 Agency business to YOU.

10 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

11 Plaintiff incorporates by reference each and every one of the General
12 Responses and Objections as though fully set forth herein. Plaintiff further objects
13 to this request because it seeks information neither relevant to the subject matter of
14 this litigation nor reasonably calculated to lead to the discovery of admissible
15 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
16 to this request on the ground that it lacks foundation. Plaintiff further objects to this
17 request on the ground that it violates the right to privacy of a third party.
18

19 **REQUEST FOR PRODUCTION NO. 54:**

20 Any and all DOCUMENTS which refer, reflect or relate to any
21 communications that YOU have had with Total Travel and Tickets in Florida
22 regarding the possible sale of the Total Travel and Tickets business to YOU.
23
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SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects to this request on the ground that it lacks foundation. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party.

REQUEST FOR PRODUCTION NO. 55:

Any and all DOCUMENTS which refer, reflect or relate to any communications that YOU have had with Admit One, located in New York, new York regarding the possible sale of the Admit One business to YOU.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects to this request on the ground that it lacks foundation. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party.

1 **REQUEST FOR PRODUCTION NO. 56:**

2 Any and all DOCUMENTS which refer, reflect or relate to any
3 communications that YOU have had with As Off Music regarding the possible sale
4 of the As Off Music business to YOU.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
11 to this request on the ground that it lacks foundation. Plaintiff further objects to this
12 request on the ground that it violates the right to privacy of a third party.
13

14 **REQUEST FOR PRODUCTION NO. 57:**

15 Any and all DOCUMENTS which refer, reflect or relate to any tickets that
16 YOU have sold to Barry's Tickets in Los Angeles, California from January 1, 2007
17 to present.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

19 Plaintiff incorporates by reference each and every one of the General
20 Responses and Objections as though fully set forth herein. Plaintiff further objects
21 to this request because it seeks information neither relevant to the subject matter of
22 this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
24 to this request to the extent that it lacks foundation. Plaintiff further objects to this
25 request on the ground that it violates the right to privacy of a third party.
26
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28

1 **REQUEST FOR PRODUCTION NO. 58:**

2 Any and all DOCUMENTS which refer, reflect or relate to any
3 complementary tickets that YOU have given to Barry's Tickets in Los Angeles,
4 California from January 1, 2007 to present.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
11 to this request to the extent that it lacks foundation. Plaintiff further objects to this
12 request on the ground that it violates the right to privacy of a third party.

13
14 **REQUEST FOR PRODUCTION NO. 59:**

15 Any and all DOCUMENTS which refer, reflect or relate to any tickets that
16 YOU have sold to Sea Coast Ticket Agency, located in Portsmouth, New
17 Hampshire from January 1, 2007 to present.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

19 Plaintiff incorporates by reference each and every one of the General
20 Responses and Objections as though fully set forth herein. Plaintiff further objects
21 to this request because it seeks information neither relevant to the subject matter of
22 this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
24 to this request to the extent that it lacks foundation. Plaintiff further objects to this
25 request on the ground that it violates the right to privacy of a third party.

1 **REQUEST FOR PRODUCTION NO. 60:**

2 Any and all DOCUMENTS which refer, reflect or relate to any
3 complementary tickets that YOU have given to Sea Coast Ticket Agency, located in
4 Portsmouth, New Hampshire from January 1, 2007 to present.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
11 to this request to the extent that it lacks foundation. Plaintiff further objects to this
12 request on the ground that it violates the right to privacy of a third party.

13
14 **REQUEST FOR PRODUCTION NO. 61:**

15 Any and all DOCUMENTS which refer, reflect or relate to any tickets that
16 YOU have sold to Total Travel and Tickets, located in Florida, from January 1,
17 2007 to present.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 61:**

19 Plaintiff incorporates by reference each and every one of the General
20 Responses and Objections as though fully set forth herein. Plaintiff further objects
21 to this request because it seeks information neither relevant to the subject matter of
22 this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
24 to this request to the extent that it lacks foundation. Plaintiff further objects to this
25 request on the ground that it violates the right to privacy of a third party.

1 **REQUEST FOR PRODUCTION NO. 62:**

2 Any and all DOCUMENTS which refer, reflect or relate to any
3 complementary tickets that YOU have given to Total Travel and Tickets, located in
4 Florida from January 1, 2007 to present.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

6 Plaintiff incorporates by reference each and every one of the General
7 Responses and Objections as though fully set forth herein. Plaintiff further objects
8 to this request because it seeks information neither relevant to the subject matter of
9 this litigation nor reasonably calculated to lead to the discovery of admissible
10 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
11 to this request to the extent that it lacks foundation. Plaintiff further objects to this
12 request on the ground that it violates the right to privacy of a third party.

13
14 **REQUEST FOR PRODUCTION NO. 63:**

15 Any and all DOCUMENTS which refer, reflect or relate to any tickets that
16 YOU have sold to Admit One, located in New York, from January 1, 2007 to
17 present.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

19 Plaintiff incorporates by reference each and every one of the General
20 Responses and Objections as though fully set forth herein. Plaintiff further objects
21 to this request because it seeks information neither relevant to the subject matter of
22 this litigation nor reasonably calculated to lead to the discovery of admissible
23 evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects
24 to this request to the extent that it lacks foundation. Plaintiff further objects to this
25 request on the ground that it violates the right to privacy of a third party.

REQUEST FOR PRODUCTION NO. 64:

Any and all DOCUMENTS which refer, reflect or relate to any complementary tickets that YOU have given to Admit One, located in New York, from January 1, 2007 to present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects to this request to the extent that it lacks foundation. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party.

REQUEST FOR PRODUCTION NO. 65:

Any and all DOCUMENTS which refer, reflect or relate to any tickets that YOU have sold to As Off Music from January 1, 2007 to present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects to this request to the extent that it lacks foundation. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party.

REQUEST FOR PRODUCTION NO. 66:

Any and all DOCUMENTS which refer, reflect or relate to any complementary tickets that YOU have given to As Off Music from January 1, 2007 to present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Plaintiff incorporates by reference each and every one of the General Responses and Objections as though fully set forth herein. Plaintiff further objects to this request because it seeks information neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible evidence, given the dismissal of Defendant's counterclaim. Plaintiff further objects to this request to the extent that it lacks foundation. Plaintiff further objects to this request on the ground that it violates the right to privacy of a third party.

Dated: March 27, 2008

MANATT, PHELPS & PHILLIPS, LLP

By: 

Raaqim A. S. Knight
Attorneys for Plaintiff
TICKETMASTER L.L.C.

PROOF OF SERVICE

I, Lori McCoy Shuler declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 11355 West Olympic Boulevard, Los Angeles, California 90064-1614. On March 27, 2008, I served a copy of the within document(s):

Plaintiff Ticketmaster L.L. C's Supplemental Responses to RMG Technologies, Inc.'s Request for Production of Documents (Set One)]

- ☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Golden State Overnight agent for delivery.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ by sending an electronic message with attached PDF.

David N. Tarlow, Esq.
Law Offices of Coggan & Tarlow
1925 Century Park East, Suite 2320
Los Angeles, California 90067-2343
Tel. No. (310) 407-0922
Fax No. (310) 407-0923
Email: dnt@cogganlaw.com

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

1 I declare that I am employed in the office of a member of the bar of this court at whose
2 direction the service was made.

3 Executed on March 27, 2008, at Los Angeles, California.

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5 Lori McCoy Shuler
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